

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOYCE R. MONGER	:	CIVIL ACTION – LAW
	:	
v.	:	NO.: 02-CV-2757
	:	
SALOMON J. BERENHOLZ	:	JURY TRIAL DEMANDED

STIPULATED MOTION FOR EXTENSION OF ALL DISCOVERY DEADLINES

Plaintiff and Defendant, by and through their undersigned counsel, hereby move this Court for an extension of all discovery deadlines, including the December 2, 2002 discovery deadline, and the January 2, 2003 summary judgment deadline in the above captioned case. In support of their motion, the parties state as follows:

1. The current discovery deadline is December 2, 2002.
2. The current deadline for filing motions for summary judgment or partial summary judgment is January 2, 2003.
3. The parties have engaged in written discovery to date.
4. On or about November 22, 2002, Defendant served answers to interrogatories and document requests.
5. Due to the information provided in these discovery responses, Defendant anticipates that he will need to take one or more depositions.
6. Additionally, Plaintiff anticipates that she will need to take one or more depositions as well.
7. The parties are currently involved in scheduling mutually agreeable dates for depositions.
8. Due to the depositions currently being scheduled and the possibility of follow up

discovery, it is anticipated that discovery will not be completed by the current discovery deadline of December 2, 2002.

9. Additionally, due to the contemplated discovery that the parties will engage in, an extension of time is necessary for summary judgment or partial summary judgment motions.
10. The parties have conferred and agree that a limited extension of all discovery deadlines is necessary in order to allow the completion of discovery in this case.
11. This is the first requests by either party for an extension of the discovery deadlines in this case.
12. The undersigned counsel understand that this matter is presently scheduled for trial on March 17, 2003, pursuant to the Scheduling Order entered on August 19, 2002.
13. Should the Court, in its discretion, determine that revising the deadline for the filing of motions for summary judgment or partial summary judgment will leave the Court with insufficient time to render a decision on any such motions prior to trial, the parties respectfully request that trial in this action be rescheduled for April 17, 2003, thereby allowing an additional thirty (30) days for a review of dispositive motions prior to trial.

WHEREFORE, the parties respectfully request that their stipulated motion be granted and

that an Order be entered, in the form attached hereto, extending all discovery deadlines by sixty (60) days and setting the discovery deadline in this case as February 3, 2003 and the deadline for filing motions for summary judgment or partial summary judgment as February 3, 2003.

Respectfully submitted,

Dated: November 27, 2002

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Dated: November 27, 2002

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ORDER

AND NOW, this _____ day of _____, 2002, upon consideration of the parties Stipulated Motion for Extension of Discovery, it is hereby ORDERED and DECREED that the motion is GRANTED, and that all discovery deadlines are extended by sixty (60) days and the discovery deadline in this case is extended until February 3, 2002.

It is FURTHER ORDERED that motions for summary judgment or partial summary judgment shall be filed on or before February 3, 2002.

J.

Certificate of Service

I, Kevin K. Carton, Jr., certify that on this day a true and correct copy of the foregoing Stipulated Motion for Extension of All Discovery Deadlines was served upon the following counsel of record via first class mail, postage prepaid, addressed as follows:

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(Attorney for Plaintiff)

Dated: November 27, 2002

Kevin K. Carton, Jr.